ENERGY TRANSFER

October 31, 2018

Ohio Environmental Protection Agency
Division of Air Pollution Control
Southeast District Office
2195 Front Street
Logan, Ohio 43138
Via eBusiness

Re: NSPS OOOOa Initial Compliance Report
January 8, 2018 through August 2, 2018
Ohio River System - REX Booster Station

Dear Sirs:

Ohio River System, LLC is submitting this letter to meet the initial annual reporting requirement of New Source Performance Standard 40 CFR 60, Subpart OOOOa (NSPS OOOOa) for affected facilities owned/operated at the REX Booster Station. The REX Booster Station is located in Monroe County, Ohio. The NSPS OOOOa affected facility is the "collection of fugitive emissions components at a compressor station".

As specified in 40 CFR 60.5410a, the initial compliance period for a NSPS OOOOa affected facility begins on August 2, 2016, or upon initial startup (whichever is later). The initial startup of compressor P006 occurred on January 8, 2018, which establishes the beginning of the reporting period. Similarly, the initial compliance period ends 1 year after the initial startup date of the affected facility or no later than 1 year after August 2. To align this report with other NSPS OOOOa reports, ORS has set the initial compliance period for the "collection of fugitive emissions components at a compressor station" affected facility at the REX Booster Station as beginning on January 8, 2018 and ending on August 2, 2018.

This initial report contained in the following sections covers the compliance period from January 8, 2018 and ending on August 2, 2018:

I. General Information (§60.5420a(b)(1))

(1) The company name and address of the affected facility.

Mailing Address: 6051 Wallace Rd Ext., Suite 300, Wexford, PA 15090
Facility Location: REX Booster Facility, 52001 Township Highway 964, Powhatan Point, Monroe County, Ohio (Latitude: 39.83583, Longitude: -80.87425)

(2) An identification of each affected facility being included in the annual report.

This report includes the following NSPS OOOOa affected facilities:

Collection of fugitive emissions components at a compressor station

(3) Beginning and ending dates of the reporting period.

This report covers the compliance period from January 8, 2018 and ending on August 2, 2018.

(4) Certification by a responsible official of truth, accuracy, and completeness

Certification statement included at closing of this letter.

II. Collection of fugitive emissions components at a compressor station (§60.5420a(b)(7))

See attached table and records of LDAR monitoring.

Should you have any questions or require additional information, please contact Nick Bryan at (570) 505-3700 or Patty Centofanti of Trinity Consultants at (412) 474-3310.

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This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Sincerely,

DocuSigned by:
Stephen D. Schuman
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Stephen D. Schuman
Sr. Director - Operations

cc: US EPA Region V, Air Protection Division
Office of Air Enforcement & Compliance
Ralph Metcalfe Federal Building
77 West Jackson Boulevard, Chicago, IL 60604-3511
Via email: 'R5AirEnforcement@epa.gov'
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Facility Name	Legal Entity	Survey Information															
		Date (b)(7)(i)	**Beginning Time** (b)(7)(ii)	**End Time** (b)(7)(ii)	**Name of OGI Operator** (b)(7)(iii)	**Training and Experience of OGI Operator** (b)(7)(iii)	**Ambient Temperature, Sky Conditions and Maximum Wind Speed** (b)(7)(iv)	**Monitoring Instrument** (b)(7)(v)	**Deviations (or Statement of No Deviations)** (b)(7)(vi)	**Number and Type of Components for Which Emissions Were Detected** (b)(7)(vii)	**Number and Type of Components Not Repaired as Required** (b)(7)(viii)	**Number and Type of DTM & UTM Components Monitored** (b)(7)(ix)	**Date of Successful Leak Repairs** (b)(7)(x)	**Number and Type of Components Placed on DOR** (b)(7)(xi)	**Explanation for DOR (b)(7)(xi)**	**Type of Instrument Used to Resurvey a Repaired Component (not during the initial finding)** (b)(7)(xii)	**Comments**
REX Booster Station	Ohio River Systems	3/5/2018	9:55 AM	11:15 AM	John Ecker	4.5 yrs experience FLIR OGI Certified Themographer	32F, Clear, Light Breeze 4-7 mph	THermaCAM GasFindIR	Yes - See Comments Yes - Footnote 2 below.	Leak #1: Ball valve handle on inlet separator Leak #2: Dump valve threads	Leaks repaired and verified within 30 days. See comments for deviations.	Not Applicable	Leaks were repaired and verified on 3/7/2018.	None	Not applicable	THermaCAM GasFindIR	See Footnote 2 below regarding the OGI camera utilized. See Footnote 3 below regarding survey recordkeeping deviations.
REX Booster Station	Ohio River Systems	5/24/2018	10:00 AM	11:15 AM	John Ecker	4.5 yrs experience FLIR OGI Certified Themographer	68F, Sunny, Light Air 1-3 mph	THermaCAM GasFindIR	Yes - See Comments Yes - Footnote 2 below.	Leak #1: Threads on sight glass, inlet separator	Leaks repaired and verified within 30 days. See comments for deviations.	Not Applicable	Leaks were repaired and verified on 5/24/2018 during the monitoring event.	None	Not applicable	THermaCAM GasFindIR	See Footnote 2 below regarding the OGI camera utilized. See Footnote 3 below regarding survey recordkeeping deviations.

1. No components at any facility are currently designated as DTM or UTM.
2. The OGI equipment utilized for the two surveys conducted in the reporting period were conducted using an OGI camera that was not listed in the Monitoring Plan. The OGI equipment used was a FLIR ThermaCAM GasFindIR. This model camera pre-dated NSPS OOOOa, and as such FLIR has not retroactively provided third party verification to the standard for this model. However, from discussions with FLIR, the ThermaCAM GasFindIR uses the same lenses and technology as the newer 'OOOOa verified' cameras which result in the GasFindIR camera being:
- capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions; and
- capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of ≤60 g/hr from a quarter inch diameter orifice.
As a corrective action, ORS has made arrangements for future surveys to be conducted with a verified camera. [40 CFR 60.5397a(f)(7), Condition C.2.c).(2), and Condition C.2.d).(5)]

3. The following required recordkeeping elements were not recorded/maintained:
a. Repair verification video not maintained on file. Per footnote 2, the OGI camera utilized does not have video recording capabilities. Leaks were documented, repaired, and verified timely.
b. Overall survey picture not taken with date and lat/lon.
c. Daily verification check includes a camera calibration prior to each monitoring survey; however, the calibration is not documented.
d. Measured maximum viewing distance was not measured/documented; however, components at this site are viewed from a distance of 2 to 10 feet which is within the recommended viewing distance.

ATTACHMENT - LDAR SURVEY RECORDS

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Ohio River System LLC - FLIR LEAK DETECTION AND REPAIR PLAN

LDAR - Quarterly FLIR Inspection Log - 2018

Start Time 9:55 a.m.

End Time 11:15 a.m.

Station Name: **Rex**

Date	Time	Conditions	Individual Conducting the Inspection	Results of the Inspection(Yes or No) If Yes, Complete Repair Record	Briefly Identify Leaking Component	Comments
3/5/2018	10:05 a.m.	Clear, Light Breeze 4-7mph, 32°F	John Ecker	Yes	Ball Valve handle on inlet seperator	Aaron Hines Present
3/5/2018	10:15 a.m.	Clear, Light Breeze 4-7mph, 32°F	John Ecker	Yes	Dump valve threads	Aaron Hines Present

Signature of Inspector: John Ecker

Date: 5/22/18

Maintain records for a period of five (5) years.

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Ohio River System LLC - FLIR LEAK DETECTION AND REPAIR PLAN

LDAR - Quarterly FLIR Inspection Log - 2018

Station Name: Rex

Start Time 9:55 a.m.

End Time 11:15 a.m.

Date of Leak Reported	Dates of Each Attempted Repair (Within 15 days)	Individual Attempting Repair	Repair Method Used	Leak Fixed? (Yes or No, If No, Complete Delay of Repair Record)
3/5/2018	3/7/2018	Aaron Hines	Replaced	Yes
3/5/2018	3/7/2018	Aaron Hines	Retape and pipe dope	Yes

Maintain records for a period of five (5) years.

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Ohio River System - FLIR LEAK DETECTION AND REPAIR PLAN

LDAR - Quarterly FLIR Inspection Log - 2018

Start Time 10: 00 a.m.

End Time 11:15 a.m.

Station Name: **Rex**

Date	Time	Conditions	Individual Conducting the Inspection	Results of the Inspection(Yes or No) If Yes, Complete Repair Record	Briefly Identify Leaking Component	Comments
5/24/2018	10:15 a.m.	Sunny, 68°F, Light Air 1-3 mph	John Ecker	Yes	Threads on site glass, inlet seperator	Operator on site immediately corrected

Signature of Inspector: John Ecker Date: 5/24/18

Maintain records for a period of five (5) years.